

SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
Lea Haber Kuck (LK-5556)
Four Times Square
New York, New York 10036
Tel: (212) 735-3000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THOMAS BROWN, INDIVIDUALLY And On
Behalf Of All Others Similarly Situated, :

Plaintiff, : No. 07 Civ. 7895 (DAB)

- against - :

CHINA SUNERGY CO., LTD., TINGXIU LU, :
JIANHUA ZHAO, JAMES SHAOFENG QI, :
GUANGYOU YIN, FENGMING ZHANG, :
SHILIANG GUO, MERRILL LYNCH, PIERCE, :
FENNER & SMITH INC., COWEN & CO., LLC, :
and JEFFERIES & CO., INC., :

Defendants. :
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**NOTICE OF MOTION
FOR ADMISSION
PRO HAC VICE OF
DONNA L. MCDEVITT**

PLEASE TAKE NOTICE that, upon the annexed Affidavit of Donna L. McDevitt, and attachments thereto, submitted herewith, China Sunergy Co., Ltd., through the undersigned, will move this Court before the Honorable Deborah A. Batts, at the United States Courthouse, 40 Centre Street, New York, New York 10007, as soon as counsel may be heard, for an order pursuant to Rule 1.3(c) of the Rules of the United States District Court for the Southern District

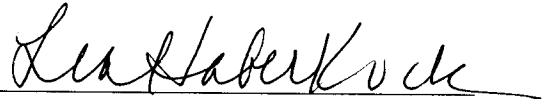
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U.S. DISTRICT COURT
S.D. OF N.Y.
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of New York, admitting Donna L. McDevitt to practice *pro hac vice* in the above-captioned matter. For the Court's convenience, a form of Order is annexed hereto.

Dated: New York, New York
January 24, 2008

Respectfully submitted,



Lea Haber Kuck (LK-5556)
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
Four Times Square
New York, New York 10036
Tel: (212) 735-3000

Attorneys for China Sunergy Co., Ltd.

Of Counsel

Frances P. Kao
Donna L. McDevitt
Ryan A. Horning
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
333 West Wacker Drive
Chicago, Illinois 60606
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THOMAS BROWN, INDIVIDUALLY And On
Behalf Of All Others Similarly Situated, :

Plaintiff, : No. 07 Civ. 7895 (DAB)

- against - :

CHINA SUNERGY CO., LTD., TINGXIU LU, :
JIANHUA ZHAO, JAMES SHAOFENG QI, :
GUANGYOU YIN, FENGMING ZHANG, :
SHILIANG GUO, MERRILL LYNCH, PIERCE, :
FENNER & SMITH INC., COWEN & CO., LLC, :
and JEFFERIES & CO., INC., :

Defendants. :

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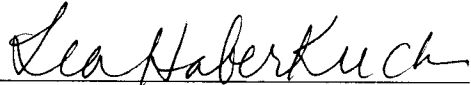
STATE OF NEW YORK)
)ss:
COUNTY OF NEW YORK)

Lea Haber Kuck, being duly sworn, deposes and states that:

1. I am counsel in this matter for China Sunergy Co., Ltd. ("China Sunergy"). I am a member of the bar of the State of New York and admitted to practice in the United States District Court for the Southern District of New York.

2. I make this affidavit in support of the motion, pursuant to Local Rule 1.3(c), for the admission of Donna L. McDevitt to practice *pro hac vice* in the above-captioned matter. I know Ms. McDevitt to be of the highest character and fully recommend her admission. Ms. McDevitt serves as counsel to China Sunergy. (See Affidavit of Donna L. McDevitt, annexed hereto).

3. As shown in the Certificate of Admission annexed to her affidavit in support of her admission *pro hac vice*, Ms. McDevitt is a member in good standing of the bar of Illinois. She is familiar with the Federal Rules of Civil Procedure and with the Rules of the United States District Court for the Southern District of New York. (See Affidavit of Donna L. McDevitt annexed hereto).


Lea Haber Kuck

Sworn to before me
this 23rd day of January 2008.


Notary Public

STEVEN RAY KATZENSTEIN
Notary Public, State of New York
No. 01KA4745340
Qualified in Queens County
Certificate Filed in New York County
Commission Expires June 30, 20 11

SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x

THOMAS BROWN, INDIVIDUALLY And On
Behalf Of All Others Similarly Situated, :

Plaintiff, :

No. 07 Civ. 7895 (DAB)

- against - :

CHINA SUNERGY CO., LTD., TINGXIU LU, :
JIANHUA ZHAO, JAMES SHAOFENG QI, :
GUANGYOU YIN, FENGMING ZHANG, :
SHILIANG GUO, MERRILL LYNCH, PIERCE, :
FENNER & SMITH INC., COWEN & CO., LLC, :
and JEFFERIES & CO., INC., :

**AFFIDAVIT OF
DONNA L. MCDEVITT
IN SUPPORT OF
MOTION FOR ADMISSION
PRO HAC VICE**

Defendants. :

----- x

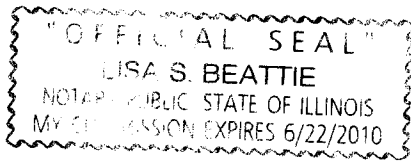
STATE OF ILLINOIS)
)ss:
COUNTY OF COOK)

Donna L. McDevitt, being duly sworn, deposes and states that:

1. I am counsel in this matter for China Sunergy Co., Ltd.
2. I make this affidavit in support of the motion for my admission to
practice *pro hac vice* in the above-captioned matter.

3. I am a counsel with the law firm of Skadden, Arps, Slate, Meagher
& Flom LLP, 333 West Wacker Drive, Chicago, Illinois 60606, telephone number (312)
407-0700, facsimile number (312) 407-0411.

4. As shown in the Certificate of Admission annexed hereto, I am a member in good standing of the bar of Illinois. I am admitted to practice before the United States District Court for the Northern District of Illinois. I am familiar with the Federal Rules of Civil Procedure and with the Rules of the United States District Court for the Southern District of New York.



Donna L. McDevitt
Donna L. McDevitt

Sworn to before me
this 22nd day of January 2008.

Lisa S. Beattie
Notary Public

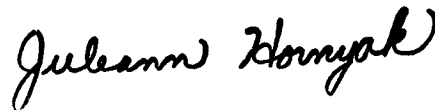
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Donna Lynn McDevitt

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 10, 1988 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Monday, January 28, 2008.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THOMAS BROWN, INDIVIDUALLY, And On
Behalf Of All Others Similarly Situated, : No. 07 Civ. 7895 (DAB)

Plaintiff, : **ORDER**

-against- :

CHINA SUNERGY CO., LTD., TINGXIU LU, :
JIANHUA ZHAO, JAMES SHAOFENG QI, :
GUANGYOU YIN, FENGMING ZHANG, :
SHILIANG GUO, MERRILL LYNCH, PIERCE, :
FENNER & SMITH INC., COWEN & CO., LLC. :
and JEFFRIES & CO., INC., :

Defendants. :
----- X

Upon consideration of the foregoing Notice of Motion for Admission *Pro Hac*
Vice of Donna L. McDevitt, and good cause having been shown,

IT IS SO ORDERED, this ____ day of January 2008, that such motion is

GRANTED.

DEBORAH A. BATTS
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

The undersigned, an attorney duly admitted to practice law before this Court, hereby certifies under penalty of perjury, that on January 30, 2008, I caused a true copy of the

- ***Notice of Motion for Admission Pro Hac Vice of Donna L. McDevitt with the annexed [Proposed] Order and Affidavit of Lea Haber Kuck in Support of Motion For Admission Pro Hac Vice sworn to on the 23rd day of January 2008 and Affidavit of Donna L. McDevitt in Support of Motion for Admission Pro Hac Vice sworn to on the 22nd day of January 2008***

to be served upon the following parties by First-Class mail:

Eric J. O'Bell
Law Offices of Eric J. Bell, LLC
3500 North Hullen Street
Metairie, LA 70002


Kim E. Miller
Kahn Gauthier Swick LLC
12 East 41st Street, 12th Floor
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Mario Alba, Jr.
Coughlin, Stoia, Geller, Rudman & Robbins, LLP
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Suite 200
Melville, NY 11747

William Bernard Federman
Federman & Sherwood
10250 N. Pennsylvania
Oklahoma City, OK 73102

Dated: New York, New York
January 30, 2008


Steven Ray Katzenstein